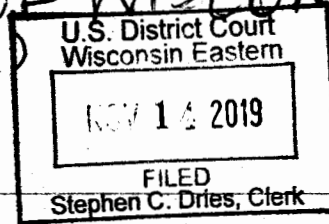


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
(Milwaukee)



Nehemias Huertas, Jr.,
Plaintiff,

DECLARATION OF
ROBERT J. DUNCAN

V.

Case No: 2:19-cv-00592-NJ-PP

Michael Hafeman, CO Waite, CO Morton, CO Murray,
Armor Health care, Well Path, Dr. Karen Horton,
Dr. Laura Sukowaty, Dr. Jackie Christanson, Dr. Shelly Johnson,
Dr. Jennifer Sabatier, Charles Dombek, Nurse Holly, Nurse Sheryl,
Nurse Mud, Nurse Scott, Nurse Jane Doe 1,
Nurse Jane Doe 2, Nurse Jane Doe 3, Nurse Jane Doe 4,
Nurse Jane Doe 5, Nurse Jane Doe 6, Nurse Jane Doe 7,
Milwaukee County.

Defendants.

Robert Duncan hereby declares:

On or about 03-05-2019 I Robert Duncan was an
inmate at the Milwaukee County House of Correction
(HOC) housed in the M6 dorm/Bed 18 (from Oct. 2018-May 20th, 2019)
where I witness inmate Nehemias Huertas Jr., ask
CO Waite multiple times to call for an escort for

Mr. Huertas to be escorted to the Health Center for immediate dressing change to his L. Elbow (open wound) wet and loose bandage after Mr. Huertas had taken a shower but CO Waite disregarded Mr. Huertas Multiple requests. Almost an hour later a shake down took place and all inmates in the M6 dorm were escorted to the South gym of the HOC where we remained for over four hours. While in the S. gym, Mr. Huertas asked CO Waite numerous times to "please" call for an officer to escort him to the Health Center. CO Waite continuously disregarded Huertas requests to receive Medical attention (for over four hours).

On 03-28-2019 approximately at 4:50 PM Mr. Huertas asked CO Morton to be escorted to the Health Center for Wound care as he had an obvious open bleeding wound and was obviously in severe pain. Huertas bandage had blood soaking thru. CO Morton disregarded Huertas serious Medical need until after dinner and Mr. Huertas wasn't escorted to the Health Center until three hours later.

On 04-13-2019 during breakfast (6:30 AM) in the M6 dorm day room I heard Mr. Huertas requesting Medical attention as he was speaking to CO Miguel.

CO Miguel called the Health Center numerous times but the Health center continuously disregarded Mr. Huertas serious Medical need. CO Miguel did her best to help Huertas as he was obviously in pain and his bandage was drenched in blood which was noticeable. Mr. Huertas wasn't escorted to the Health Center for over seven hours (1:30 PM).

On 04-29-2019 around 9pm in the M6 dorm while on our bunks, Mr. Huertas approaches the officers desk and asked CO Gilbert to be escorted to the Health Center. Huertas was in tears and obviously in chronic pain and his bandage was soaked in blood. The Health center recklessly disregarded Huertas serious Medical need. I see Huertas approaches the CO's desk again at this moment CO Murray was at the desk next to CO Gilbert. I hear CO Murray laugh very loud and stated "that's why you're gonna be in pain all night!" CO Murray also recklessly disregarded Mr. Huertas serious Medical need and also intentionally inflicted emotional and mental distress on Mr. Huertas.

I declare under penalty of perjury that the foregoing is true and correct

PAGE 3 OF 4

Executed at Milwaukee, Wisconsin
on September 26th, 2019.

Robert J. Duncan

Robert Duncan SPN. 407358

Booking No. 2019018075

DOB [REDACTED] 1985

C.C.
Robert J. Duncan
Nehemias Huertas Jr.
U.S. Clerk of Court